

1. Plaintiff Gordon Roy Parker, a/k/a "Ray Gordon," is an adult male domiciled and residing in the Commonwealth of Pennsylvania, who may be served at the address listed for him in the caption. Plaintiff is the owner and operator of Snodgrass Publishing Group, a Pennsylvania Sole Proprietor and Internet media company, whose primary website is toosmarttofail.com.

2. Defendant **Jacqueline Faye Goldhagen**, a/k/a **Jacqui Holland** ("Defendant"), is an adult female domiciled and residing in Los Angeles, California. She is a "rising star" actress known for cutting-edge and extremely sexy PG-13 work (e.g., *Bikini Avengers*, *Hollywood Sex Wars*, *Life As A Hot Loser*, etc.), and a hypnotist/life coach, who may be served at the address listed for her in the caption. Her current website is <http://www.newagehypnotist.com>.

NATURE OF ACTION

3. Many years ago, this court branded Plaintiff a serial litigant, though he would assert that time has validated his arguments. With two cataracts, Stage III COPD, two gallstones, high blood-sugar, and numerous other medical concerns, Plaintiff has far better things to do than to "throw down" in Federal court. Nevertheless, this case exists solely because **Defendant** threatened to sue Plaintiff over a negative *Yelp!* review, using her attorney to amplify the threat. Plaintiff's review of the underlying facts, and subsequent events, have given rise to this action.

4. This action stems from the breach of a contract, a threat of litigation by Defendant over Plaintiff's negative review of her practice, and alleged defamation of Plaintiff by Defendant in response to said negative review. All attempts at mitigation and settlement have failed.

STATEMENT OF JURISDICTION AND VENUE

5. Personal jurisdiction in Pennsylvania is conferred by Defendant's threat to sue Plaintiff, as the defamation suit would have to occur in this jurisdiction.

6. Subject-matter jurisdiction is conferred by diversity jurisdiction and the amount in controversy, both in the Complaint and in the threatened defamation claim.

7. Supplemental jurisdiction is conferred over all other claims.

8. Venue is proper because Plaintiff resides within the Eastern District Of Pennsylvania.

BACKGROUND

9. Plaintiff incorporates by reference, as if fully stated verbatim herein, the entire contents of all previous paragraphs, and all exhibits to this Complaint.

"Boxing Jacqui"

10. On June 4, 2015, after viewing an impressive (and very sexy) display of hypnotic talent from Defendant, in a "past-life regression" video on YouTube, Plaintiff began exploring the possibility of hiring Defendant to make for him a customized hypnosis video, hopefully the first of at least two, to help improve Plaintiff's eyesight by dilating his pupils, with the second to help him improve at chess by linking winning at chess to the reward-center response created by desire for the attractive female hypnotist.

11. Initially, the eyesight video, in which a sexy female hypnotist uses her beauty and powerful hypnosis technique of the kind possessed by Defendant (and few others, let alone sexy female others), was Plaintiff's top priority, due to its (relatively) tame content, and commercial potential. Plaintiff, a successful and profitable producer of hypnosis recordings in his own right (*Anonymistress, Hellen I/II, MegaSleep*), had hoped to produce the "eye video" to launch his *Patient Empowerment Network Of New York* (PENNY), via the website <http://www.patientempowerment.net>, which is currently under construction. Penny Parker is Plaintiff's late mother. With a strong alternative-medicine presence fueling the portal, Defendant was even more of a perfect fit for the gig.

12. The eye video seemed directly up Defendant's alley, given her willingness to be sexy on camera, especially for a greater purpose (eyesight), her extreme level of training and polish generally common only to working performing artists, her three years of experience as a stage hypnotist, her active hypnosis practice, and that she and her eyes were desirable enough to

induce pupil dilation, the goal of the video. Hypnotherapy videos with similar content from similar talent can easily gross tens of thousands of dollars, more than enough to launch PENNY, which Plaintiff hopes to one day establish as an empowered-patient portal connecting like-minded practitioners and patients. The primary barrier to producing such videos is finding talent, which is why they sell so well.

13. Had the eye video been made successfully, at first for Plaintiff's personal use, Plaintiff intended to offer Defendant the "number two" role in PENNY, as its spokesmodel and primary hypnotist, with revenue from the eye video serving as a form of charter contribution (of Plaintiff's half of the revenue). Her royalty from the eye video would have been 50 percent of gross profit, while the "charter spokesmodel" gig included five percent ownership of the portal. For perspective, the painter of Facebook's in-house mural was paid in stock which wound up worth over \$200 million, far more than the value of the actual painting.

14. The eye video was never proposed to Defendant, because Plaintiff soon discovered that Defendant offered *custom fetish videos* (hypnosis is a known sexual fetish) via the *Customs Club* website (<http://www.customs4u.com>), to an audience which includes men who, like Plaintiff, enjoy being hypnotized by beautiful women:

Cherie DeVille
Kendi Cumming
Brooke Marie

customsclub.com

**DOWNLOAD
YOUR
FANTASY**



ORDER MY CUSTOM VIDEO CLIPS **DOWNLOAD YOUR FANTASY**
Private and Personal Videos made JUST FOR YOU!

Order Jacqui Holland Custom Videos
Get your own Jacqui Holland Custom Videos make you your own script, idea or fantasy at CustomsClub. Having your own Jacqui Holland Custom Video produced just for you is the ultimate keepsake! If you are looking for your own custom made fetish video, produced from your own idea then CustomsClub is the place to order Custom Jacqui Holland Videos.

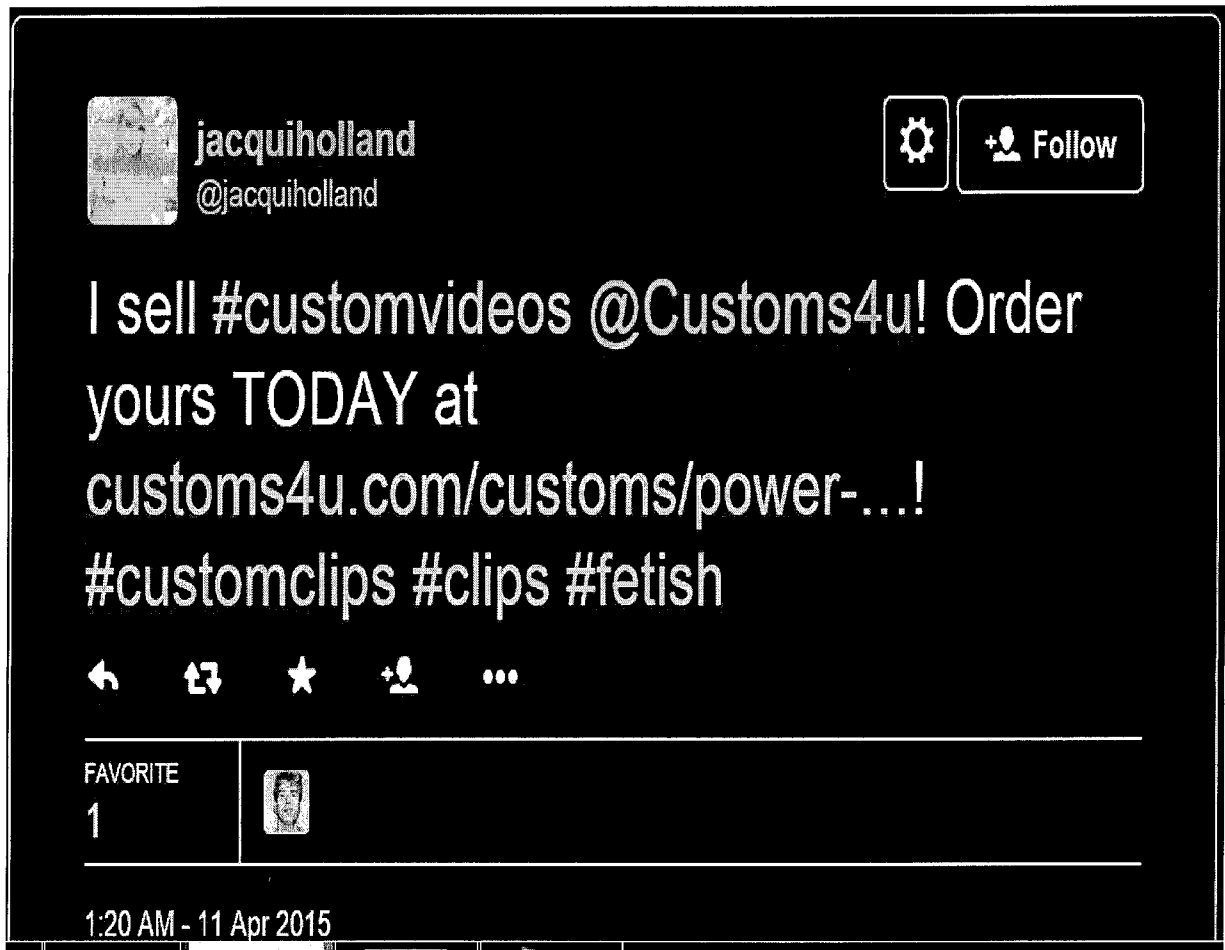
Download Jacqui Holland Videos
Stream and download pre-made Jacqui Holland Custom Videos and clips.

Make an Offer to Jacqui Holland
Make an offer to Jacqui Holland for anything you want, you name the price! For example you could make Jacqui Holland an offer to: buy signed photos, panties, Skype ID, Skype Shows, SnapChat, Mobile number, get a Twitter Follow, personal ATM meets, Go Shopping, or see if Jacqui Holland will meet you for coffee!"

Make a Phone or Video Call with Jacqui Holland
Make a phone or video call with Jacqui Holland simply book a session and connect one-on-one using your PC, Mac, Tablet or Phone!

<http://www.customvideosclub.com/customsclub/jacqui-holland/>
Retrieved on June 8, 2015 at 9:07 am

15. Plaintiff was hardly shocked (though delighted) to learn that Defendant had (apparently) embraced the sexy, cutting-edge side of hypnosis, as her YouTube video had also indicated. He immediately sought, and found, confirmation that this ad was genuine, via Defendant's own Twitter account:



<https://twitter.com/jacquiholland/status/586806082959441920>
Retrieved June 8, 2015 at 9:14 am.

16. Plaintiff has long expected Hollywood and the hypnofetish to finally collide, having waiting patiently for *years* for someone with Defendant's skillset and experience to materialize, and had finally found what he was seeking. Having finally found one, he was going to approach her with great caution, great respect, substantial compensation, and a vision which he hoped she would share enough to make real and profitable, not much different from other internet collaboration.

17. Prior to offering her commercial projects, however, Plaintiff's first goal was to secure, for his own use, a hypnosis induction video, preferably for chess. He therefore avoided creative

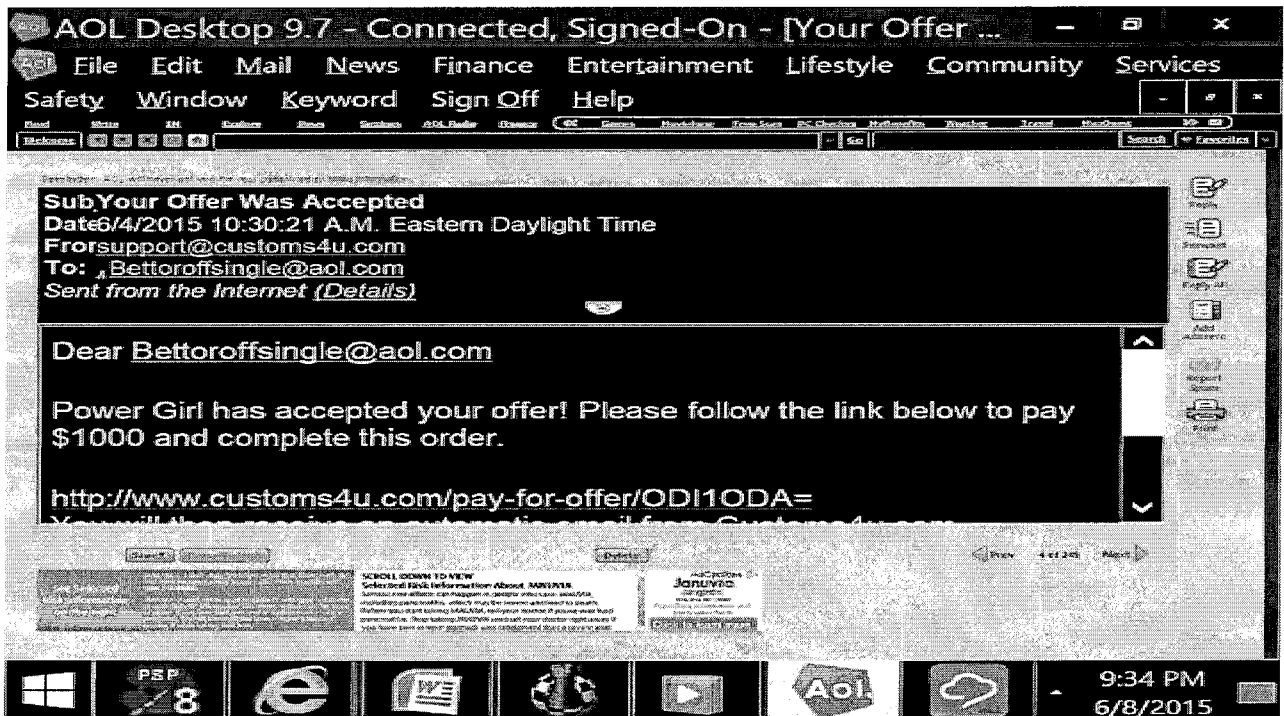
conflict at all costs, deferring to Defendant's wishes regarding scripting, content, and the limits of sexualized expression for the first video.

18. In the absence of the *Customs Club* page, Plaintiff would have simply offered Defendant the eye video, with its *g-rated* script, told her he wanted a deep trance with an eye-contact induction, and suggestions of extreme pupil dilation, a request to which Defendant certainly would not have objected. Once completed, Plaintiff would then have offered a minimum of \$5,000.00 for the rights to the video, up to a percentage of PENNY in return for the spokesmodel gig, with the work already having been performed. Based on information, belief, and the common-sense of a kindergartener, Plaintiff avers that Defendant would have accepted the spokesmodel gig.

19. By working through *Customs Club*, the parties were still primarily contracted to each other, but also to the third-party website, thus further ensuring the likelihood that Plaintiff would actually receive the chess video once ordered. Not long after first viewing her YouTube video, Plaintiff offered Defendant \$1,000.00 to make a "sexy hypnosis video for chess improvement," with the type of scripting mentioned earlier in this Complaint.

20. As with the eye video, the chess video's market value was such that Plaintiff had planned to offer Defendant a substantial amount of money for the rights to this video, for his *Chicks Dig Chessplayers* campaign, tied to Plaintiff's successful dating-advice books.

21. Defendant accepted Plaintiff's offer, not once, but twice (Plaintiff had submitted a duplicate by mistake):



22. A binding contract between the parties now existed.

23. To avoid any confusion created by the duplicate offers, Plaintiff immediately e-mailed Defendant at the address listed on her Twitter page to clarify that he was paying \$1,000.00 for the chess video, and for her to delete the second offer. Upon written acknowledgement of which of the two contracts was the valid one, Plaintiff would immediately pay the \$1,000.00 to *Customs Club*.

24. Defendant responded to Plaintiff's e-mail with a counter-offer of her own:



25. In response, Plaintiff fired Defendant, due to her extreme lack of ethics, telling her only that she had "flunked an audition [he] wasn't even giving," as there was no need to inform someone with whom Plaintiff was breaking contact any further regarding why. In the letter, Plaintiff requested that Defendant never contact him again.

26. The breach also destroyed *Boxing Jacqui* for Plaintiff's personal use, since he no longer trusted the hypnotist "inside his head." Plaintiff elected to cut his losses and continue his search, lest he be falsely accused of pestering Defendant.

27. Despite the explicit advisory not to contact Plaintiff in this state, Defendant immediately e-mailed him *three* consecutive times, with Plaintiff deleting all three mails without reading, as he had no intention of ever hiring or speaking with Defendant again.

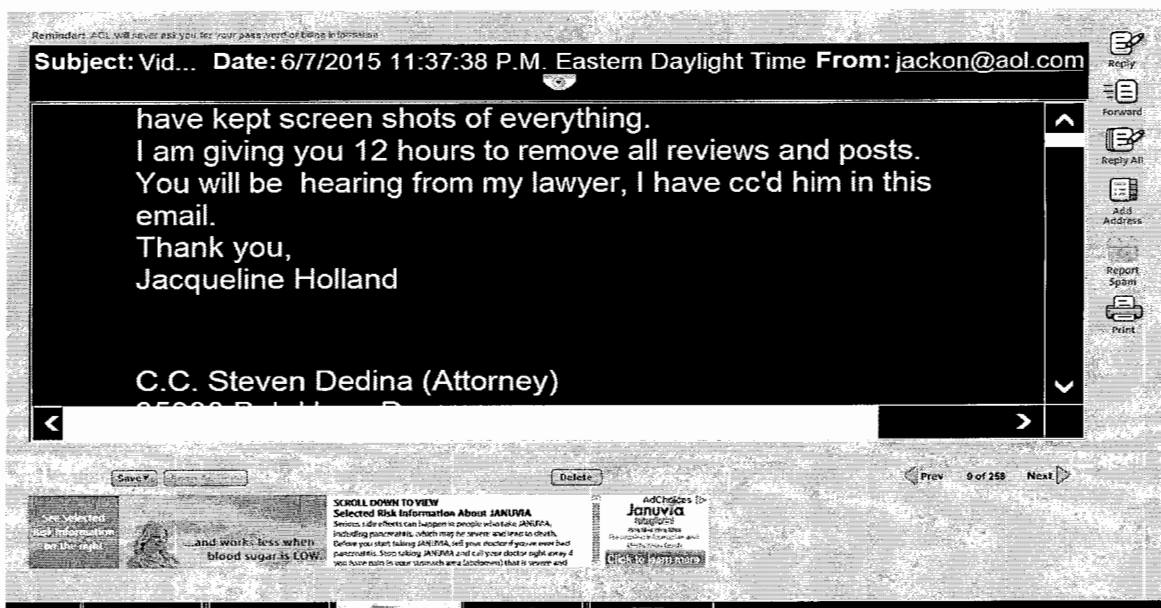
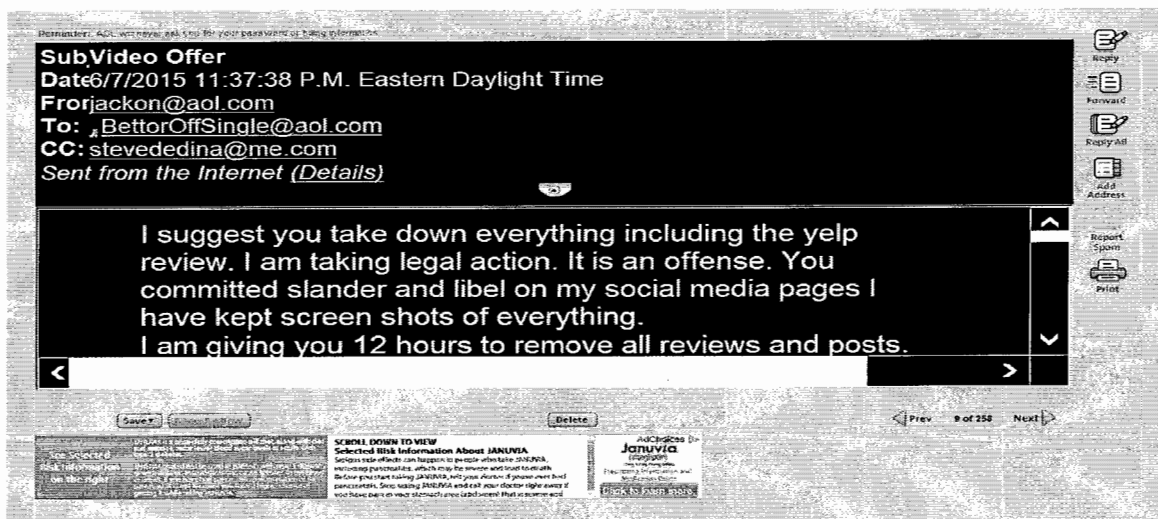
28. At this point, Defendant's e-mails ceased, and Plaintiff "took his case to the people."

29. Between his negative experience with Defendant, and her having "stalked" him three times, Plaintiff decided to don his *social-justice warrior* (SJW) cape, and post online reviews of Defendant, as well as making "protest" posts on her social-media pages, concerning both the breach of contract, Defendant's marketing as a fetish model, and the annoyance of having to remove the "hypnotic seal" Plaintiff had allowed to develop in order to make himself more receptive to Defendant's anticipated video hypnosis. Even without hypnosis, any dispute will intensify emotions temporarily, until cooler heads prevail.

30. On June 6, 2015, Plaintiff posted his review of Defendant to *Yelp!*. The full text of the review as it last appeared on June 9, 2015, before Plaintiff voluntarily replaced it pending adjudication, is attached hereto as Exhibit A and incorporated by reference as if fully stated verbatim herein.

31. Plaintiff avers that there are no false and misleading statements concerning Defendant in Exhibit A, his *Yelp!* review of her practice.

32. On June 7, 2015, Defendant E-mailed Plaintiff, with a copy to her attorney, Steven J. Dedina, Esq., a cease-and-desist order, threatening legal action if Plaintiff did not remove *all* of his postings concerning Defendant and her practice, including the *Yelp!* review.



33. Defendant consented to publication on her own social-media pages, and has (or had) full power to moderate and delete any postings, without involving Plaintiff.

34. At the time of publication, Defendant either knew, or should have known, that the *Yelp!* review was not defamatory, and that to threaten litigation over same runs afoul of both California's anti-SLAPP statute, and Pennsylvania's Dragonetti Act.

35. As mitigation gestures of good faith, and pending the outcome of this litigation, on June 10, 2015, Plaintiff replaced the *Yelp!* review with a five-star review of Defendant's "ability

to put people into hypnosis," while noting he may update the review later. He added a rebuttal to the *Ripoff Report* review that the audience should reserve judgment until all facts are revealed at this trial, and that he would retract and abandon any position ruled unfavorably, in lieu of deletion, which *Ripoff Report* does not allow. Defendant was immediately put on notice of this. This is the new *Yelp!* (five-star) review of Defendant's induction ability, with the original *on free-speech chilled ice* until adjudication

PA

6/10/2015

LEGAL DISCLAIMER: I was *not* hypnotized into writing this review...to the best of my knowledge.

"All Hypnosis Is Stage Hypnosis"

For now, I am going to comment only on Jacqui's ability to put people into hypnosis. I may update both this review and the rating later as more information becomes clear as it relates to her practice in general.

Jacqui Holland has an amazing talent for inducing hypnosis. I have personally focused on her induction video and can say this from firsthand experience. Hypnotists who tell you that you were hypnotized even if you don't feel hypnotized are usually covering for their weaknesses.

I often like to say to people who have asked me, that once they are truly hypnotized, they will know it. With Jacqui, you'll know. I say this as a "difficult" subject with forty years of experience, who has trained hypnotists and produced successful hypnosis recordings. That I became an easy subject for Jacqui on a video not even intended to hypnotize the viewer indicates greatness.

One caution: Jacqui's a skilled, trained, actress. Hypnosis in her hands can be amazing, but also like a wild amusement park ride. Prepare accordingly.

Hours


Mon	9:00 am - 7:00 pm
Tue	9:00 am - 7:00 pm
Wed	9:00 am - 7:00 pm
Thu	9:00 am - 7:00 pm
Fri	9:00 am - 7:00 pm
Sat	Closed
Sun	9:00 am - 7:00 pm

Edit business info

More business info

By Appointment Only Yes

This business is a Yelp adverti




Bella T.

First to review

Browse nearby

Restaurants, Nightlife, Sho



36. Not content to wait for her day in court, on June 7, 2015, Defendant posted a rebuttal to the *Ripoff Report*:



http://www.ripoffreport.com/r/New-Age-Hypnotist-Jacqui-Holland/Los-Angeles-California-90064/
New-Age-Hypnotist-Jacqui-Holland-Fetish-Models-Should-Not-Do-Hypnotherapy-Los-Angeles-Ca-1234148

Retrieved on June 9, 2015 at 9:50 pm

37. Defendant's statement contains four parts: a) a claim that Plaintiff tries to ruin the careers of attractive female hypnotists; b) that Defendant is a "board certified hypnotist," c) that she is not a "fettish" [sic] hypnotist, and d) that the contents of the site to which Defendant Linked -- the user-created *Encyclopedia Dramatica* "wiki" style page about Plaintiff -- were factually kosher, and painted a correct portrait of Plaintiff.

38. At the time of publication, Defendant either knew or should have known that the statement in 37(a) is false. She has confused Plaintiff's opinionated reviews and speech with deliberate attempts to ruin careers. Prior to her breach, his only intention was to pay her

\$1,000.00 for an amazing hypnosis video, and perhaps move on to monetizing their collaborations.

39. Defendant's claim in 37(b) that she is a "board certified hypnotist" runs afoul of numerous California laws governing commerce and medical practice, while her claim in 37(c) that she is not a "fettish hypnotist" [sic] are refuted by photographs in paragraphs 14-15.

Encyclopedia Dramatica (ED)

40. *Encyclopedia Dramatica*, best described as a *Wiki From Hell*, and to which Defendant linked as noted in 37(d), is on a foreign-based server, for all purposes immune from suit and liability, even for the authors of its user-generated content, who use it as a refuge for content which would never last on an American server, and which would have them sued immediately upon publication. Plaintiff became aware that a page devoted to him (the "ED page") had been created sometime in 2011. Its content has recently changed drastically, and it was last updated in May, 2015:

<h1>Ray Gordon</h1> <p>From Encyclopedia Dramatica</p> <p>Gordon Roy Parker, who likes to pretend his name is Ray Gordon, is a 45 year old semi-well known Usenet kook and YouTube user that lived with his mother in West Philadelphia. He is known through hundreds of usernames online, and seems to have an issue sticking with one identity. Many of his older Twitter accounts are suspended due to hate speech against women.</p>		 <p>Gordon Roy Parker, who uses the fake name Ray Gordon</p>
<h2>Contents</h2> <ul style="list-style-type: none"> □ 1 On USENET □ 2 On YouTube 		

https://encyclopedia-dramatica.se/Ray_Gordon

Retrieved on June 8, 2015

41. ED is run by *Lulzsec*, a splinter group from *Anonymous*. In late 2011, when Plaintiff was "following the money," a PayPal donations link was provided to him for the account of Ryan Cleary, who, at the time, had been ordered off the internet by a British court for various computer-related crimes.

42. The section of the ED Page entitled "USENET" states the following concerning Plaintiff:

On USENET

One of Gordon's first notable acts was when he harassed a woman named Tabitha Hassell (<http://groups.google.com/group/alt.hypnosis/msg/19450f02ce03007c>) into moving in order to get away from him. Gordon has also been known to try to solicit underage gymnasts to convince them to let him coach them. He also posts fanfic that revolves around himself torturing, raping and killing young gymnasts (<http://groups.google.com/group/alt.sex.stories/msg/e17add4a3645c68e>). *alt.seduction.fast* became his favorite group soon after he discovered it, and his life revolved around it ever since.

Right after the jews did wtc, Gordon quickly proclaimed that there was no significant loss of life in those towers. Gordon quickly took steps to remove the posts from the Google Groups archive, but the posts were saved thanks to several people reposting them all over the usenets (<http://groups.google.com/group/alt.sport.horse-racing/msg/18ad935a954689a3>).

43. Defendant's chosen source, a website which claims that the *Jews did WTC*, contains a link to a USENET posting in *alt.sex.stories*, which the ED page claims was authored by Plaintiff, and which is "*fanfic that resolves around himself torturing, raping and killing young gymnasts.*" The link to the *first part* of the story is in Google's USENET archive at <http://groups.google.com/group/alt.sex.stories/msg/e17add4a3645c68e>. That story states, in part, verbatim (with headers truncated):

From: Iown...@hotmail.com
Subject: Ray Gordon vs. The Magnificent Seven
Date: 1998/09/18
Message-ID: <36027EBC.3C45@hotmail.com>

Newsgroups: alt.sex.stories

Ray Gordon vs. The Magnificent Seven

My name is Ray Gordon. I'm a mercenary, a soldier of fortune, a hired gun, a bounty hunter, only I don't fight wars or catch crooks. My work is .. shall we say .. a little more specialized. People pay me to stalk, terrorize, torture, rape and sometimes .. yes .. even snuff beautiful young starlet cunts. In other words, I'm a pussy hunter, a cunt commando, if you will. I love my work, and I ask no questions. Someone wants me to stalk, rape and snuff some stuck-up starlet cunt, that's their business. As long as they pay the bills and the veal is fresh, that's all I care about.

That's why I don't bat an eyelash when the limo pulls up to Divers Bar & Grill, my favorite hangout, and some chink in a suit and tie steps out. I'd gotten a page an hour before, made the call, and arranged the meeting. When the chink walks in the door, I can tell he's a spook. He spots me right away and gestures at me with his finger. I smirk, get up, and follow him out the door.

The limo door opens and the chink slides in. I scan the area for trouble, see nothing, and follow suit. A fat, smelly, chink in a sweaty uniform is sprawled out along the back seat. He is eating an ice cream sundae, and strawberry sauce is smeared over his mouth like bad lipstick, making him look a little queer. The chink in the suit gives me another finger wag, and I decide to commit myself by taking a seat. As soon as I'm completely inside, the chink slams the door behind me, and the limo speeds off.

"You were recommended to me," the fat chink in the uniform lisps. "My people tell me you ..do things for people .. for a price."

"Your people were right," I counter. "The price depends on the job. High profile, high overhead. I don't take any jobs where I can't come away clean. That kind of security takes money. I'm a pro .. the best in the business .. and I only work with pros."

"I assure you, Mr. Gordon," the chink in the suit finally speaks, only it's more like a sneer. "We are professional ... thoroughly professional. You, on the other hand, don't appear to be any more than a beer-swilling ... how do you Americans say it ..? loser ..."

"Appearances can be deceiving, Charlie," I return his gaze with some ice of my own. "Perhaps you'd like to pull over and see how much of a loser I am."

"That won't be necessary, Mr. Gordon," the fat chink in the uniform interrupts. "My sources are impeccable. They tell me you're the man we need for this operation, and that .. as they say .. is that."

The chink in the suit turns away from me and stares out the tinted windows.

"So, tell me about this operation ..?" I turn to the fat chink. "Just who the fuck are you guys? Vietnamese? Korean?"

"Chinese," the fat man doesn't look pleased.

"I am General Chow-Fat of the People's Republic of China. This man is an agent of my government's intelligence organization. We call him Dragoncock."

"Cute ..." I almost laugh.

"I assure you, Mr. Gordon," the general was trying to sound threatening. "Mr. Dragoncock is anything but cute."

"So what do you want with me?" I ask, tiring of the game. "You obviously want me to bag some cunt for you, so why don't we just cut to the chase."

The general smiles and hands me an envelope. There's a photo inside, a photo that almost makes my jaw hit the floor. Almost ...

"That's the US Women's Gymnastics team," I try not to sound apprehensive.

"I believe your press has dubbed them the Magnificent Seven," Chow Fat licks his lips as he speaks. "They are due to appear at the Olympic Games in Atlanta in two days. We believe they will defeat our glorious team. They cannot be allowed to do so. Am I making myself clear?"

"You want me to nab these cunts so they don't show up your slanty-eyed gook girls at the big Games," I laugh. "That's a new low, even for me."

"You won't do the job, then?" Chow Fat seemed puzzled. "I was told you ..."

"I didn't say that, Fat Man," I cut him off

"Perhaps, Mr. Gordon knows when a job is beyond his abilities," Dragoncock spoke softly.

"There ain't no cunt bagging job beyond my abilities, Snailcock," I glared at him. "I'm just trying to figure out the angle here. So, you guys need to win. I can respect that. So why not just snip their brake cables or something. Why do you need me? I'm a cunt hunter; I don't fix sporting events. The mob takes care of that kind of shit."

"Just eliminating the girls is not enough, Mr. Gordon," Chow Fat lisped. "They are an affront to our way of life. They are admired as capitalistic idols while our girls cower in their shadow. Death is not .. suitable. It is not enough. They must be shamed, broken, defiled, rendered inhuman. They must have every bit of their dignity stripped away before the world's eyes. They will be the butt of every bathroom joke in the world. They will be so shamed, they will wish to die. Our ideals will prevail, and our girls will be the darlings of the world ..."

"I'm beginning to get the picture," I cut him off. "This isn't about just winning the Olympics. This runs deeper, more political."

"It is not political, Mr. Gordon," Chow Fat wheezed. "It is a matter of survival. Since the accursed Russians and their allies have fallen, we are the last bastion of Truth in the world. We will not be denied our glory by seven young teenage cunts, as you call them." He paused. "So will you take the job?"

I paused. I had to hand it to Fatty. He knew how to pitch. I could just see myself choke fucking one of the little cunts, jamming my cock down her throat, and making her bend to my iron will. He had me interested, and he knew it."

"This is some serious shit," I spoke after another moment. "I'll need some men for this ..."

"Your fabled Zero Squad," Fatty winked at me.

"That's right," I nodded, impressed that he had obviously done his homework.. "I get one million; my first lieutenant Killjoy gets a half mil; each man gets a quarter."

"And how many men will you need?" Fatty didn't even bat an eyelash when he heard my price.

"At least 25 if you want the job done right."

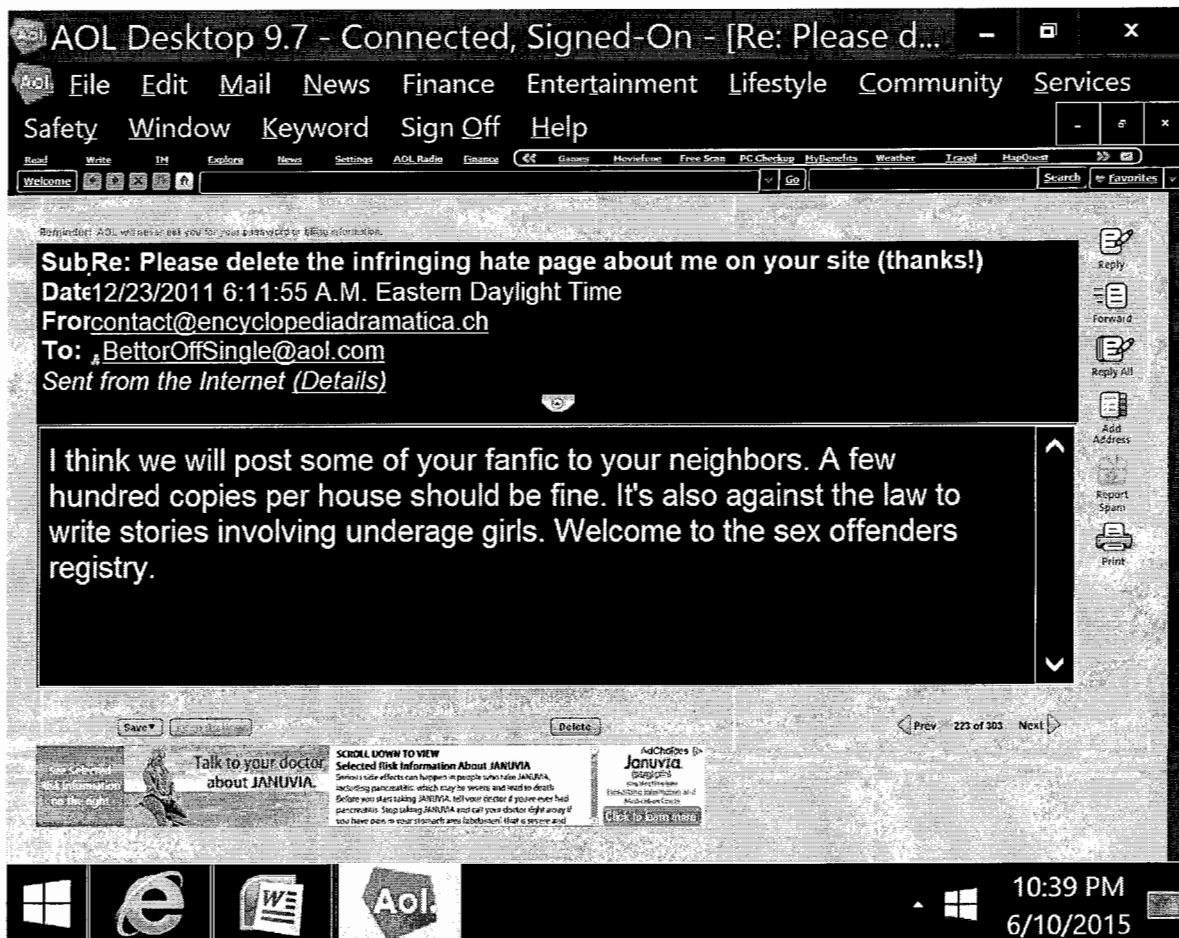
"25?" Dragoncock exclaimed.

"You can pay me, or let Snaildick here handle it," I smirked. "Although I guess you already considered that option, which is why I'm sitting here." I paused. "That's my offer. I don't dicker. You have three more seconds to consider it."

"You will have your money," Fatty didn't even drop a beat. "But, you will be accompanied by Dragoncock in order that we may keep track of our investment."

From the tone of his voice, I knew this was non-negotiable, a necessary evil, if you will. I thought of the money and the tight teenage pussies that awaited me. "Okay, you've got a deal." Like I said, I enjoy my work.

44. In December, 2011, Plaintiff asked the ED administrators to delete the ED page, which prompted them to taunt him that the server's real address is hidden behind its proxy host, CloudFlare, of California, and to effectively threaten to attempt to make Plaintiff homeless should he file suit, with the following threatening e-mail:



45. The ED page has been linked to or referenced by many of Plaintiff's political adversaries, including notable "revenge porn" advocates Adam Steinbaugh and Amanda

Levendowski, both *juris doctors*. The existence of the ED page has isolated Plaintiff to the point where interacting with others risks violent vigilante "justice"; he has often contemplated suicide, though has no plan or intent (his COPD would seem to allow him to off himself in Oregon).

46. At the time of publication, Defendant either knew or should have known that Plaintiff did *not* author this essay. It was authored by a thirty-eight year-old man from Massachusetts named **David Clanton**, a gymnastics groupie who was enlisted, in exchange for personal access to the *Magnificent Seven* and other elite gymnasts, via a female coach named Linda McNamara, who admitted a few years ago in an article that she covered up sexual abuse in the gym where she worked, run by disgraced elite coach Don Peters. McNamara had taken it upon herself to attempt to discredit Plaintiff's claims that Olympic gymnast Dominique Moceanu had been abused, organizing a group of fans, including Clanton, who would call itself the *Gymnastics Mafia*.

47. The male Mafia members were given duties that included a) sending a computer virus to Plaintiff b) threatening violence and death against Plaintiff and his mother; and c) *impersonating Plaintiff online* and making sexualized comments to gymnasts in order to shift the blame to Plaintiff, who survived any and all investigations into his conduct, as he is simply not a pedophile and was merely seeking to stop child abuse.

48. In late 1997, Clanton taunted Plaintiff that he had impersonated Plaintiff's late mother, Penny Parker, twice, on USENET, in a manner which has subsequently sent men to prison:

Post #1:

Google

Search for topics

Bettor...

Groups

Show only message

Show unmasl

From: "Penny Parker" <willby...@hotmail.com>
 Subject: Use my mouth!!!
 Date: 1997/12/18
 Message-ID: <679v59\$c8c@basement.replay.com>#1/1
 X-Deja-AN: 299196471
 X-MS4ALL-Date: Thu, 18 Dec 1997 02:44:10 CET
 Content-Type: text/plain
 Organization: Replay and Company UnLimited
 X-001: This message was forwarded by an automated remailing service.
 X-002: No attempt was made to verify the sender's identity.
 X-003: Please report misuse to <ab...@replay.com>
 Newsgroups: alt.personals.bondage

Hello sugar,

You like getting blowjobs, and I NEED to feel your hot hard manhood in my mouth!! Call (215) 386-7366 (Philadelphia PA) and ask for Penny. You'll NEVER find a girl more eager to suck, or more grateful for the opportunity to swallow.

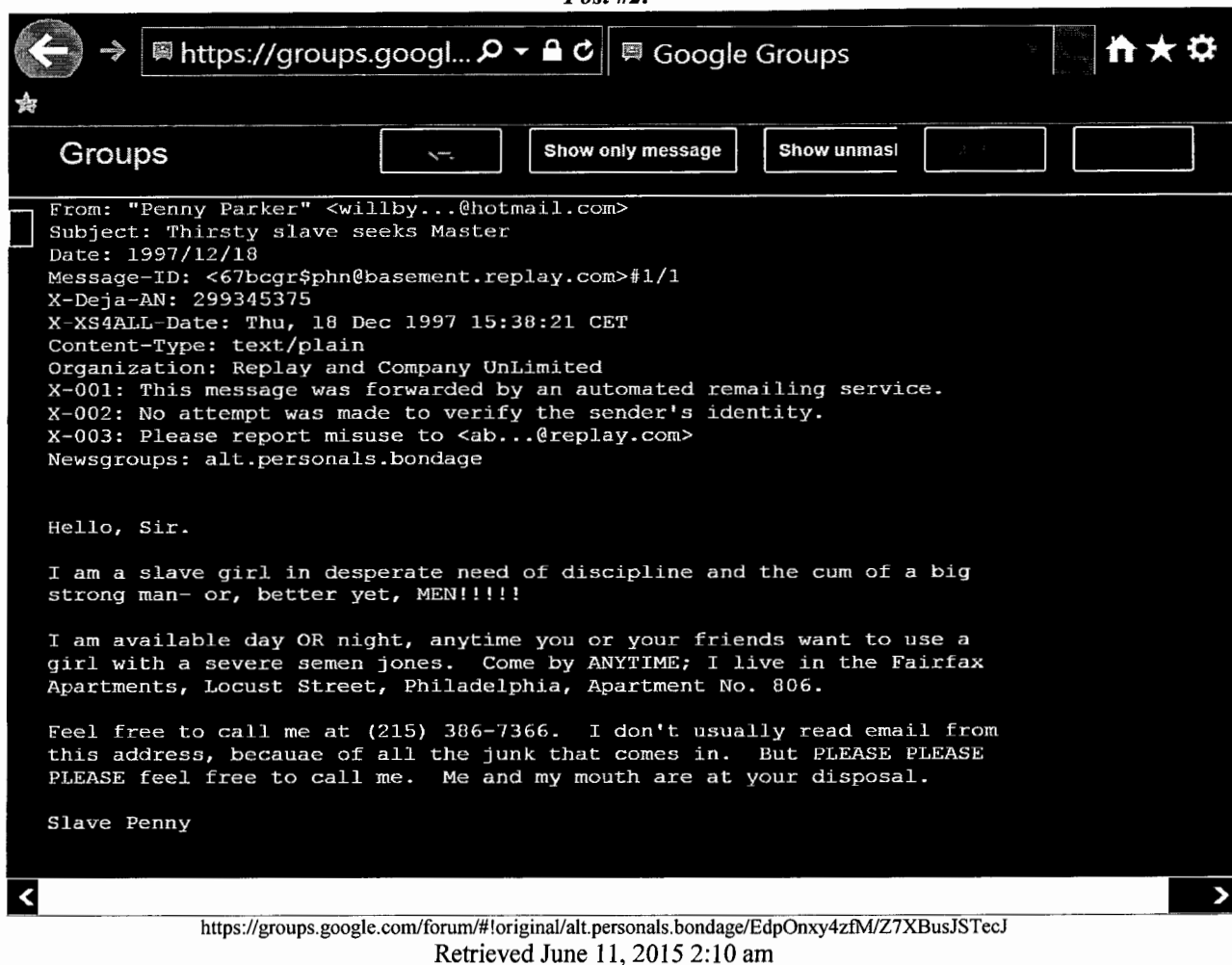
Penny Parker
 4247 Locust St. # 806
 Philadelphia, PA 19104

Call me, use me! I'm HORNY!!!!!!!!!!!!!!

<https://groups.google.com/forum/#!original/alt.personals.bondage/EdpOnxy4zfM/Z7XBusJSTecJ>

Retrieved June 11, 2015 2:07 am

Post #2:



49. Plaintiff, who quickly posted a response to the first message, warning men not to call, knows exactly how many did so anyway, because he answered each call: *four*. The purpose of the ad was to drive Plaintiff's mother -- like the astrologer Defendant, a Taurus born in mid-May -- into evicting her *caregiver* son, so as to cut off his internet access. Further playing to the stereotype of the *loser-who-lives-with-his-mother* by Clanton and other Mafia males included false claims that Plaintiff was on welfare and food stamps. In reality, Plaintiff had grown up well-off on the Upper East Side of New York, and had long since tired of using money and status to win the approval of individuals like Clanton.

50. The purpose of the female Mafia members, most notably McNamara and Pearson, was to make false allegations against Plaintiff, and to enlist the males in various tasks to intimidate or harm Plaintiff, all in the name of covering up the Moceanu abuse story. When Moceanu ran away in October, 1998, this conflict effectively ended, though various skirmishes would continue through the 2000 Olympics.

51. In the section of the ED page entitled *Ray's Self-Proclaimed Careers*, any job or business engaged in by Plaintiff is defaulted to scam status, further evidence that Plaintiff is just an overall fraud:

<p>Ray's self-proclaimed careers</p> <p>At various times in the past, Gordon has claimed to be:</p> <ul style="list-style-type: none"> ▫ Pro gymnastics coach - Claims to train several gymnasts online ▫ Pro chess player and/or chess coach - Only a bit shy of becoming World Champion. Also claims to be Internationally ranked Note: the USCF has NO listing of him on their website. According to information we have, Ray's old rating exists, but his membership is not current. ▫ Pro handicapper and oddsmaker - According to his web site ▫ Pro finance market analyzer - According to his web site ▫ Pro relationships adviser - Teaches men "how to get laid" ▫ Pro hypnotist and hypnosis instructor - Harasses and bad mouths female hypnotists ▫ Writer - Writes a book about seduction, horse racing and Dominique Moceanu ▫ Best secretary in the USA - But got fired because he wasn't an "office whore" ▫ Paralegal - Pennsylvania requires some sort of professional certification, but Ray doesn't know that. ▫ Activist against child abuse and sexual harassment - Claims that gymnastics coaches are child abusers ▫ Professional psychic - And still doesn't have a clue about the Editorial Staff of RayFAQ ▫ Civil Rights Activist - Claims that hiring discrimination has prevented him from being employed. Filed suit against UPenn. Hmmmm... ▫ Journalist - Not accredited by any news agency, though. ▫ Software Company CEO & entrepreneur - Own company, of course ▫ Successful business owner - Also known as broke, and filed bankruptcy in 1997. 	
<p>Other Links</p> <ul style="list-style-type: none"> ▫ Internet guru - He can't read headers on Usenet posts, but he's learning. ▫ Sports historian - Hmm... ▫ Body builder - And of course extremely good looking ▫ Jesus Christ - Only in past life though. ▫ Skilled Hypnotist - Claims to be able to "Gain TOTAL Sexual Control" over women 	

Source: ED PAGE, Retrieved June 9, 2015

52. At the time of publication, Defendant either knew or should have known that numerous of the above statements concerning Plaintiff are false and/or misleading, to the point of portraying Plaintiff in a false light. Plaintiff has a 4.0 GPA from a year at SUNY, his USCF rating peaked at Expert (90th percentile) within two years of his first tournament game. Plaintiff coached the 1990 Parkway Gamma High School from an 0-3 record when he got them, to a 5-5 finish, third place, and a 9-1 crushing win over third-ranked Washington to close the year. He has given paid psychic readings (Defendant does similar and is not mocked), has produced hypnosis mp3 recordings that have grossed five figures, grew up among a home-based transcription service which was the largest in NYC at its peak in 1979, has designed popular and profitable methods for rating horse races and sports teams, *types 100 wpm*, has worked for years as a high-level secretary and paralegal, and published an article about the Moceanu abuse case in 1995, and again in 1997, long before the truth was known to the public.

53. At the time of publication, Defendant either knew or should have known that the imputation of unauthorized paralegal practice upon Plaintiff is false, although an investigative reader would quickly verify that Pennsylvania has no such restrictions, contrary to the claim.

RayFAQ: 1999-2014

54. Even after Moceanu's scandal resolved, the *RayFAQ* continued to follow Plaintiff wherever he went online, including *alt.seduction.fast*, Ground Zero for the internet "pickup artist" (PUA) movement, popularized by Neil Strauss's *The Game* (2005) and *VH-1's The Pickup Artist*. In tow from *alt.sports.gymnastics* came Thom E. "Subzero" Geiger (Posting as SubZer0@freon.net), who registered the domain ray-gordon.com, where he ultimately hosted the RayFAQ, but only after he was banned from hosting it on the server of hardcore white-

supremacist group *The Order Of White Knights*. "Subzero" is not to be confused with the "zero squad" referenced in the rape/murder essay.

55. *Immediately* upon publication of *Outfoxing The Foxes*, Plaintiff became a target for defamation in the USENET group *alt.seduction.fast* (ASF), Ground Zero for the internet "PUA" movement which would mainstream in 2005 with Neil Strauss's *The Game*. This was painstakingly detailed in Plaintiff's RICO claims in Parker v. Learn The Skills Corp. (I-III), (case cites omitted). Leading the charge from *alt.sports.gymnastics* was Geiger, who originally claimed his wife, Susan, was so enraged by Plaintiff's postings that Geiger was spurred into action. Joining Geiger on ASF was Derek "Odious" Trunk, the group's self-proclaimed "FAQ administrator," and an internet right-hand to Ross Jeffries, another PUA guru featured in *The Game*, a teacher of NLP seduction, or the use of *covert hypnosis* to seduce women.

56. On ASF, the *RayFAQ* page had morphed from its original purpose in the gymnastics community, to a robo-defamation machine which conferred Section 230 immunity on anyone who linked through it to ray-gordon.com, including Geiger (or so he claimed), the sole individual Plaintiff could sue directly, in Columbus, Mississippi. Geiger had repeatedly threatened Plaintiff with physical violence, making it terrifying for Plaintiff to file suit in Mississippi; he instead pursued a RICO action in this district (Parker v. LTSC I), which failed.

57. Beginning in 2001, a man later identified as John J. Tashjian ("JJT") began posting to ASF, repeatedly linking to the RayFAQ, and eventually claimed the RayFAQ.com domain when Plaintiff finally abandoned it. In conjunction with Trunk (Odious), Geiger, and others on ASF loyal to Jeffries, they disrupted every thread to which Plaintiff would post, in order to destroy his ability to communicate with his fan base, and to defame him at every turn.

58. Tashjian's many threats against Plaintiff are already canonized in the Parker v. LTSC trilogy. Typical of his conduct, which includes thousands of similar postings all tarring Plaintiff while linking to the *RayFAQ* and *Google-bombing* his birth name, was the following (split into parts):

